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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**  
11

12 BRANDON MITCHELL, an individual, )  
13 Plaintiff, )

14 vs. )

15 ROBERTINO SAZDOV, an individual; )  
EAN HOLDINGS, LLC, a foreign limited )  
16 liability company dba Enterprise Rent-A- )  
Car; DOES I through XV; DOE )  
17 EMPLOYEES I through X, and ROE )  
CORPORATIONS I through X, inclusive, )  
18 Defendants. )  
19

Case No. 20-cv-2246

**DEFENDANT ROBERTINO  
SAZDOV'S NOTICE OF  
REMOVAL OF ACTION TO THE  
UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEVADA**

20 **TO: THE UNITED STATES DISTRICT COURT FOR DISTRICT OF**  
21 **NEVADA:**

22 PLEASE TAKE NOTICE that DEFENDANT ROBERTINO SAZDOV hereby  
23 removes the state action entitled "BRANDON MITCHELL, individually vs.  
24 ROBERTINO SAZDOV, EAN HOLDINGS, LLC dba Enterprise Rent-A-Car, DOES  
25 I-XV, DOE EMPLOYEES I-X, and ROE CORPORATIONS I-X," Case No. A-20-  
26 814493-C filed in the Eighth Judicial District Court for the State of Nevada in and for  
27 the County of Clark to this Court.

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1 The grounds for removal are based on diversity jurisdiction pursuant to 28  
2 USCS § 1332, as follows:

3 1. The residences of all three named parties are diverse:

4 a) Plaintiff resides in Nevada;

5 b) Defendant EAN Holdings, LLC is a Delaware corporation; and

6 c) Defendant Sazdov is a foreign national residing in the Republic of  
7 North Macedonia.

8 2. The amount in controversy exceeds \$75,000.00, as Plaintiff has alleged more  
9 than \$55,114.78 in medical specials, with more than \$53,000.00 from the  
10 night of the accident alone (for the ambulance and UMC emergency room  
11 care).

12 3. The request is timely submitted as Mr. Sazdov was served with Summons  
13 and Complaint on November 13, 2020.

14 Dated: December 11, 2020

BREMER WHYTE BROWN & O'MEARA  
LLP

15  
16 By: 

17 Anthony T. Garasi, Esq.  
18 Nevada State Bar No. 11134  
19 Madeline M. Arcellana, Esq.  
20 Nevada State Bar No. 13816  
21 *Attorneys for Defendant Robertino Sazdov*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of December 2020, a true and correct copy of the foregoing document was electronically delivered to CM/ECF for filing and service upon all electronic service list recipients and was served via U.S. Mail upon all parties listed below.

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Danielle Alvarado, an employee of  
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